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Eric E. Lenck  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MAERSK, INC. and A.P. MOLLER-MAERSK A/S,

Plaintiffs,

**05 CIV 4356 (CM)**

-against-

NEEWRA, INC., REDNIHOM, INC., AREF HASSAN ABUL  
INC., ARWEEN SINGH SAHNI a/k/a ARWEEN SAHNI SINGH  
a/k/a ARWEEN SAHNI a/k/a ARWEEN SINGH a/k/a ABUL  
SABAH a/k/a AREF HASSAN ABUL, MOHINDER SINGH  
SAHNI a/k/a MOHINDER SAHNI SINGH a/k/a MOHINDER  
SAHNI a/k/a MOHINDER SINGH a/k/a MOHINDER SINGH  
SAHANI a/k/a MOHINDER SAHANI a/k/a MOHINDER  
SAHANI SINGH a/k/a JOGINDER SINGH SAHNI, JOGINDER  
SINGH SAHNI a/k/a JOGINGER SINGH SAHNI a/k/a  
JOGINDER SAHNI SINGH a/k/a JOGINGER SAHNI SINGH  
a/k/a JOGINDER SINGH a/k/a JOGINDER SAHNI a/k/a  
JOGINGER SINGH a/k/a JOGINGER SAHNI, SABHARWAL  
CHANDRA KUMAR a/k/a SABHARWAL K. CHANDRA,  
MANDEEP SINGH SAHNI a/k/a MOHINDER SINGH a/k/a  
MOHINDER SAHNI a/k/a MOHINDER SINGH SAHNI a/k/a  
MOHINDER SAHANI a/k/a MOHINDER SINGH SAHANI,  
HELP LINE COLLECTION CO. W.L.L., PARKER DAWOOD  
TAJUDDIN TAJUDIS ISMAIL PARKER, SARDAR TRADERS  
EST., SARDAR INTERNATIONAL TRADING CO., AL  
TAMASOK AL ARABI EST., JOHN DOE I-100 (fictitious) and  
JOHN DOE INC. I-100 (fictitious),

**KAHN**  
**AFFIRMATION**  
**IN SUPPORT OF**  
**MOTION FOR**  
**SUMMARY**  
**JUDGMENT**

Defendants.

-----X

LAWRENCE J. KAHN, an attorney at law, affirms under penalty of perjury as follows:

1. I am an attorney admitted to practice before this Court and am a partner of the law firm of Freehill Hogan & Maher, LLP, 80 Pine Street, New York, New York, attorneys for Plaintiffs Maersk, Inc. and A.P. Moller-Maersk A/S (collectively, "Maersk"). I am not a party to the action and am over 18 years of age. I submit this Affirmation in support of Maersk's motion for summary judgment against Defendants Joginder Singh Sahni ("JSS"), Parker Dawood Tajuddin Tajudis Ismail Parker ("Parker") and Help Line Collection Co. W.L.L. ("HLC").

2. In an effort not to overburden the Court with duplicate copies of items that have already been filed with the Court and are already a part of the Record of this action, the undersigned incorporates by reference the following:

- a) the Amended Verified Complaint, docket entry 95;
- b) the Judgments against Neewra Inc., Rednihom Inc., and Aref Hassan Abul Inc., docket entry 167 and against Arween Singh Sahni and Sabharwal Chandra Kumar, docket entry 183;
- c) the Messkoub Declaration, docket entry 67;
- d) the Court's Decision and Order of March 27, 2008, docket entry 155;
- e) the Pinto Declaration, docket entry 130;
- f) the Ghirardani Declaration, docket entries 72-77;
- g) the Zakaria Declaration, docket entry 129;
- h) JSS Answer, docket entry 158;
- i) HLC Answer, docket entry 159;
- j) Parker Answer, docket entry 160;

- k) the Court's Memorandum and Order of August 1, 2006, docket entry 84;
- l) the Court's Decision and Order of March 27, 2008, docket entry 155;
- m) the JSS Declaration, docket entry 68;
- n) the Kanal Declaration, docket entry 63;
- o) the Hansen Declaration, docket entry 65;
- p) the RICO Statement, docket entry 145;
- q) the Court's Memorandum and Order of September 23, 2008, docket entry 176;
- r) the Court's Memorandum and Order of March 6, 2009, docket entry 178;
- s) the Pretrial Order, docket entry 188;
- t) any other Declarations filed in this action on behalf of Maersk.

3. During discovery, Defendant Parker produced a bank record purporting to show the establishment of a bank account in his name at Al Ahli Bank of Kuwait which shows receipt by him of the funds that Maersk had posted in the Kuwaiti Court to secure the release of the M/V ALVA MAERSK. A copy of this document is attached hereto as Ex. 1.

4. During discovery, Defendant Parker produced a document purporting to be a copy of his business card for Blue Bird. A copy of this document is attached hereto as Ex. 2.

Dated: New York, New York  
March 31, 2009



The image shows a handwritten signature in black ink, appearing to read "Lawrence J. Kahn". Below the signature is a horizontal line.

**KAHN EXHIBIT 1**



البنك الأهلي الكويتي ش.م.ك.  
AL AHLI BANK OF KUWAIT K.S.C.

Account Number : 0603-689457-001  
 Account Type : CURRENT ACCOUNT  
 Currency : KWD  
 Date of Request: 20 August 2008  
 From Date : 31 March 2005  
 To Date : 31 May 2005

PARKAR DAWOOD TAJUDDIN

Statement of Account

Date التاريخ	Description التفاصيل	Debit مدين	Credit دائن	Balance الرصيد
	Brought Forward Balance			.000
12 Apr 2005	CASH DEPOSIT		1,000.000	1,000.000
09 May 2005	CLG.CHQ DEPOSIT 86041 - CENTRAL BANK		578,385.700	579,385.700
15 May 2005	CASHIER ORDER ISSUED 0500118200 0600118200	57,838.570		521,547.130
15 May 2005	COM-CSHR ORDER ISSUE 0600 HO34 00035 150505 124625	5.000		521,542.130
18 May 2005	COM-TT ISSUE	3.000		521,539.130
18 May 2005	TELEX TRANSFER BR06002005001459	500,547.130		20,992.000
18 May 2005	ACCOUNT TRANSFER To Ac 0600-515586-001	15,000.000		5,992.000
18 May 2005	COM-ACCOUNT TRANSFER	.500		5,991.500
	Turnover	573,394.200	579,385.700	
	Carried Forward Balance			5,991.500

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**KAHN EXHIBIT 2**



**PULSAFEEDER**  
ELECTRONIC CONTROLS  
A Unit of IDEX Corporation



**D.T. PARKAR**

General Manager

**WATER TREATMENT SERVICES**

**BLUE BIRD CO. W.L.L.**

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13130 Safat Kuwait

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